

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

JUN 13 2018

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,)

Plaintiff,)

v.)

HOLLIE PRUITT,)

Defendant.)

4:18CR510 CDP/NCC

INDICTMENT

COUNT I

[Conspiracy to Commit Bank Fraud]

1. From in or about September 2015 through in or about October 2015, in the Eastern District of Missouri and elsewhere, the defendant,

HOLLIE PRUITT,

and other conspirators, both known and unknown to the Grand Jury, did knowingly and willfully combine, conspire, confederate and agree with each other and others known and unknown to the Grand Jury, to commit the following offense against the United States:

- a. To knowingly execute and attempt to execute a scheme or artifice to defraud and to obtain money, funds, credits, assets, securities owned by and under the custody and control of a financial institution as defined under Title 18, United States Code, Section 20, by means of materially false and fraudulent pretenses, representations and promises in violation of Title 18, United States Code, Section 1344.

MANNER AND MEANS OF THE CONSPIRACY

2. The primary purpose of the conspiracy was for the defendant and her co-conspirators fraudulently to obtain United States currency from a financial institution insured by the Federal Deposit Insurance Corporation, specifically, US Bank, by cashing forged or counterfeit checks.

3. It was further a part of the conspiracy that the defendant recruited various individuals to go into various banks, credit unions and financial institutions to present the forged or counterfeit checks for cashing.

4. It was a part of the conspiracy that the defendant provided to her co-conspirators counterfeit checks reflecting the bank account information of the legitimate account holder, "CJ."

4. It was a part of the conspiracy that the defendant instructed her co-conspirators to cash the checks at retailers with check cashing services and financial institutions in the Eastern District of Missouri and elsewhere, knowing that the legitimate account holder had not authorized the negotiation of the checks.

5. It was a part of the conspiracy that the defendant often drove her co-conspirators to locations where she instructed them to cash the counterfeit checks she had provided.

6. It was a part of the conspiracy that the counterfeit checks ranged in specific amounts, always under \$1,000.00.

7. It was a part of the conspiracy that the defendant paid her co-conspirators approximately \$200 for each counterfeit check successfully cashed.

All in violation of Title 18, United States Code, Section 1349.

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 18, United States Code, Section 981 (a)(1)(C) and Title 28, United States Code, Section 2461, upon conviction of an offense in violation of Title 18, United States Code, Sections 1349, as set forth in this indictment, the defendant, **HOLLIE PRUITT**, shall forfeit to the United States of America any property, real or personal, which constitutes or is derived from proceeds traceable to such violation(s).

2. Subject to forfeiture is a sum of money equal to the value of the property, real or personal, constituting or derived from proceeds traceable to such violation(s).

3. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

Dated: _____

A TRUE BILL

FOREPERSON

JEFFREY B. JENSEN
Acting United States Attorney

Gwendolyn E. Carroll, NY4657003
Assistant United States Attorney